

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) KENNEDYS CMK LLP 120 Mountain View Boulevard P.O. Box 650 Basking Ridge, New Jersey 07920 Phone: (908) 848-6300 Fax: (908) 647-8390 <i>Counsel for Non-Party Movant Allied World National Assurance Company</i> DAVID M. KUPFER	Case No.: 20-21436 (Jointly Administered) Judge: Honorable Stacey L. Meisel Chapter: 11
In Re: SITO MOBILE SOLUTIONS, INC., et al. Debtor.	NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY, TO THE EXTENT APPLICABLE, TO PROSECUTE COVERAGE LITIGATION AGAINST DIRECTORS AND OFFICERS OF DEBTORS

PLEASE TAKE NOTICE that on February 2, 2021 or as soon thereafter as counsel may be heard, Non-Party Movant, Allied World National Assurance Company (“Allied World”), shall move before the United States Bankruptcy Court for the District of New Jersey, before the Honorable Stacey L. Meisel, U.S.B.J., at the Martin Luther King Federal Building and Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order for relief from the automatic stay, to the extent applicable, to prosecute coverage litigation against directors and officers of debtor SITO Mobile Solutions, Inc.

PLEASE TAKE FURTHER NOTICE that in support of this motion Allied World shall rely upon the enclosed Certification of Matthew J. Lodge, and the Brief;

PLEASE TAKE FURTHER NOTICE that Allied World shall seek entry of the proposed form of Order included herewith.

Respectfully submitted,

/s/ David M. Kupfer

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Dated: January 11, 2021

CERTIFICATE OF SERVICE

I hereby certify that the within Motion, Certification of Counsel, supporting Brief, and proposed form of Order were filed on this date with the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey by using the CM/ECF system and understand that the electronic notice of the filing will automatically be sent to all counsel and/or pro se parties of record.

/s/ David M. Kupfer

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